



Office of the Associate Vice President for Business Services  
Old Queen's Building  
Rutgers, The State University of New Jersey  
83 Somerset Street • New Brunswick • New Jersey 08901-1281  
Office: 732/932-7866 • FAX: 732/932-7281

August 25, 2005

Mr. Harry R. Steinmetz (3HS62)  
U.S. Environmental Protection Agency, Region 3  
1650 Arch Street  
Philadelphia, PA 19103-2029

Dear Mr. Steinmetz,

The following is the response from Rutgers, The State University of New Jersey (Rutgers) to your request for information pertaining to the Safety Light Corporation Site, Bloomsburg, Pennsylvania received on July 25, 2005:

*1. Describe in detail the extent of the business relationship between Rutgers and Safety Light.*

RESPONSE: Based upon our investigation, and discussion with a former employee of U.S. Radium, it appears likely (but not certain) that the ledger entry you provided us (see Enclosure #1) reflects a purchase by Rutgers from Safety Light of a 0.188 millicurie Po-210 source in 1966.

Rutgers also purchased from Safety Light an Isolite self-luminous exit sign (SLE) in the mid 1980's.

- (a.) The SLE was disposed to SRB Technologies, Inc. of Winston-Salem, NC in November of 2002. (see Enclosure # 2)
- (b.) We do not have independent documentation as to the purchase of the 0.188 milliCurie Po-210 source.
- (c.) Based on consultation with Mr. Thomas Caffarella (see question #8) and the material and activity (0.188 milliCurie Po-210), we surmise that the ledger entry reflects, most likely, a purchase of a static eliminator or foil which would not have been returned to the Site. (Additional information contained in question #4.)

2. *Did Rutgers ever transport and/or broker hazardous substances or radioactive waste or other wastes that were disposed of or reclaimed by U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal, Isolite to the Site?*

RESPONSE: We do not believe that Rutgers has ever transported or brokered hazardous substances or radioactive wastes to any of the named companies.

3. Not applicable

4. *Did Rutgers ever generate radioactive waste or other wastes that were disposed of or reclaimed by U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal, and Isolite at the Site?*

RESPONSE: Rutgers has well maintained records of the disposal of radioactive materials from 1987 to the present. The records do not indicate that Rutgers ever generated wastes that were disposed of or reclaimed by one of the named companies or at the Site.

Please note:

(a.) Provided that Rutgers did acquire a Polonium 210 device from U.S. Radium in 1966 (based on the ledger entry provided to Rutgers by the EPA), it is possible, but highly unlikely, that Rutgers returned the device to U.S. Radium or the Site.

(b.) Polonium 210 has a radioactive half-life of approximately 138 days and decays to a stable progeny nuclide. Therefore, given the time between 1966 and the present (about 103 half-lives), even if the Polonium source was returned to the Site, it would have decayed to background and would not be a contributor to any radiological contamination at the Site.

5. Not applicable

6. Not applicable

7. Not applicable

8. *If you have any other information about other party(ies) who may have information that may assist the Agency in its investigation of the Site, or who may be responsible for the generation of, transportation to, or release of contamination at the Site, please provide such information.*

RESPONSE: Mr. Thomas Caffarella provided information to us regarding the practices of U.S. Radium Corp. in the 1960's and 1970's. He worked with former U.S. Radium Corp. employees who had subsequently worked for NRD. His current address is:

Mr. Thomas Caffarella

(b)  
(6)

Phone: (b) (6)

*If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If pertinent records or documents were destroyed or are missing, provide us with the following:*

RESPONSE: A review of our disposal records indicates that we have centralized, readily available records from 1977 to the present for hazardous wastes disposal and 1987 to the present for radioactive wastes disposal. We are not specifically aware of responsive documents which have been lost, destroyed, or stored in an unindexed warehouse. However, we cannot exclude the possibility that a responsive record may have existed which we are not aware of.

9(a.) Our current document retention policy for radioactive and RCRA wastes is attached. (See enclosure #3).

9(b.) Not applicable

9(c.) Not applicable

9(d.) The following individuals would have been responsible for retention of these documents:

Mr. Michael Quinlan, Associate Vice President for Business Services,  
Radiation Safety Officer (RSO)

Address: (b) (6)

Phone Number: (b) (6)

Mr. Mark McLane, CSP,  
Director- Rutgers Environmental Health and Safety (REHS)

Address: (b) (6)

Phone Number: (b) (6) (6)

Mr. Mark Kelly, Manager Environmental Services-REHS

Address: REHS, (b) (6)

Phone Number: (b) (6)

Mr. Patrick McDermott, University Health Physicist-REHS

Address: REHS, (b) (6)

Phone Number: (b) (6) (b) (6)

Mr. Dan Howell Jr., Former Director, REHS and RSO

Last known address: (b) (6)

Last known phone number: (b) (6)

D.O.B. (b) (6)

Dr. Edward Christman, Former Supervising Radiological Physicist, REHS.

Last known address: (b) (6)

Last known phone number: (b) (6)

D.O.B. (b) (6)

Dr. Francis Haughey, Former RSO at Rutgers

Last known address: (b) (6)

Last known phone number: (b) (6)

D.O.B. (b) (6)

Please do not hesitate to contact me at (732) 932-7866 should you have questions regarding our submission.

Sincerely,



Michael C. Quinlan

Associate Vice President for Business Services

C: B. Rich, Associate General Counsel  
M. McLane, Director REHS

Enclosures:

- Enclosure 1: Ledger referencing Po-210 source and Rutgers
- Enclosure 2: Disposition Letter Regarding Isolite Self-Luminous Exit Sign
- Enclosure 3: Appropriate Sections of REHS Document Retention Policy

**Enclosure 1**

NEW BRUNSWICK, N.J.

P. No

RUTGERS - STATE UNIV.

1966

ABC Lamin A 29-5218-28 (FR)

1 8-22-66 1 Pa. Pa 2000 1/4 x 4 on 2 1/2" backing  
2 R100462 # 55822  
3 12463

121 MC

HINGED FLAT OPENING  
RAG LEDGER

GOLDSMITH BROS., Stationers & Printers, 77 Nassau St., N. Y. 8, CO 77900  
FORM 70-3

00167

001671

## **Enclosure 2**

THE STATE UNIVERSITY OF NEW JERSEY  
**RUTGERS**

Rutgers Environmental Health and Safety  
Building 4127 • Livingston Campus  
Rutgers, The State University of New Jersey  
24 Street 1603 • Piscataway • New Jersey 08854-8036  
732/445-2550 • FAX: 732/445-3109

December 2, 2002

Director of Nuclear Material Safety and Safeguards  
ATTN: GLTS, U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
Re: GLD Disposal

Dear Sir or Madam:

The following is being provided pursuant to 10 CFR 31.5 (c)8(ii). The devices listed on the attached document and described briefly below, were disposed to SRB Technologies, Inc. on 11/18/02. This company is authorized to accept these devices for disposal.

The devices were disposed from both Rutgers University and the University of Medicine and Dentistry/Robert Wood Johnson Medical School (UMDNJ). Our department is contracted by UMDNJ to perform Health Physics services for their Piscataway and New Brunswick campuses.

Please note that the serial numbers on the devices were hand written with ink by the manufacturer and are severely faded and difficult to make out. The serial numbers provided therefore are only approximations and may be incorrect; corroboration from the manufacturer may be required.

**Device Identification**

Device: Self Luminous Exit Signs  
Manufacturer: Brandhurst (SRB Technologies, Inc.)  
Model Number: B100's & N10's  
Serial Number: See attached  
Desc: H-3 gas 25 Ci originally  
Date of Transfer: 11/02/02  
Quantity: 18

Device: Self Luminous Exit Sign  
Manufacturer: Isolite  
Model Number: B100  
Serial Number: See attached  
Desc: H-3 gas 22 Ci originally  
Date of Transfer: 11/02/02  
Quantity: 1

**Disposed to:**

SRB Technologies, Inc.  
2580 Landmark Drive  
Winston Salem, NC 27103  
Tel: 336-659-2610

SRB Technologies, Inc.  
2580 Landmark Drive  
Winston Salem, NC 27103  
Tel: 336-659-2610

If you have any questions please feel free to contact me at 732-445-2550 or maldrich@rehs.rutgers.edu.

Sincerely,

Mary Aldrich  
Health Safety Specialist

MA.mpaldrichgld

cc: J. Neubauer, M. Quinlan, P. McDermott, SRB Technologies, Inc.



Manf.	REHS ID #	Isotope	Original Activity	Units	Model Number	Serial Number	Affiliation	Manf Date	Origin	Disposal Date	Disposed to:	Activity (mCi) 11/18/02
Brandhurst *	GL SLE 2	H-3	25	Ci	B100	23188	Rutgers	Nov-85	HIP Bldg. Route 1	11/18/2002	SRB Technologies, Inc.	9557
Brandhurst *	GL SLE 3	H-3	25	Ci	B100	23197	Rutgers	Nov-85	HIP Bldg. Route 1	11/18/2002	SRB Technologies, Inc.	9557
Brandhurst *	GL SLE 4	H-3	25	Ci	B100	23195	Rutgers	Nov-85	HIP Bldg. Route 1	11/18/2002	SRB Technologies, Inc.	9557
Brandhurst *	GL SLE 5	H-3	25	Ci	B100	23198	Rutgers	Nov-85	HIP Bldg. Route 1	11/18/2002	SRB Technologies, Inc.	9557
Brandhurst *	GL SLE 6	H-3	25	Ci	B100	23187	Rutgers	Nov-85	HIP Bldg. Route 1	11/18/2002	SRB Technologies, Inc.	9557
Brandhurst *	GL SLE 7	H-3	25	Ci	B100	23199	Rutgers	Nov-85	HIP Bldg. Route 1	11/18/2002	SRB Technologies, Inc.	9557
Brandhurst *	GL SLE 8	H-3	25	Ci	B100	23409	Rutgers	Nov-85	HIP Bldg. Route 1	11/18/2002	SRB Technologies, Inc.	9557
Brandhurst *	GL SLE 9	H-3	25	Ci	B100	23410	Rutgers	Nov-85	HIP Bldg. Route 1	11/18/2002	SRB Technologies, Inc.	9557
Brandhurst *	GL SLE 10	H-3	25	Ci	B100	?	Rutgers	Nov-85	HIP Bldg. Route 1	11/18/2002	SRB Technologies, Inc.	9557
Isolite	GL SLE 20	H-3	20	Ci	2040	D5101223	Rutgers	Oct-85	Camden Kitchen	11/18/2002	SRB Technologies, Inc.	7609
* Brandhurst Safety Sign - SRBT <a href="http://www.betalight.com">www.betalight.com</a> 336-659-2610												

## **Enclosure 3**

# Rutgers University Libraries

[About Libraries](#)

[Library Collections](#)

[Library Services](#)

[Library News](#)

[Libraries & Collections at Rutgers: Special Collections and University Archives: Records Management:](#)

**Suggestions & Comments to:**  
**Stephen Dalina**  
**Records Management Coordinator**  
[dalina@rci.rutgers.edu](mailto:dalina@rci.rutgers.edu)

**Thomas Frusciano**  
**University Archivist**  
[fruscian@rci.rutgers.edu](mailto:fruscian@rci.rutgers.edu)

**May 5, 2005**

## Record Retention Schedule: REHS

**NOTE:** All documents with a Disposition of DESTROY should be shredded via confidential recycling

List your record retention schedules below, then fill in the detail for each title.

- 1 Accident
- 2 Accident
- 3 Accident
- 4 Asbestos
- 5 Asbestos
- 6 Asbestos
- 7 Asbestos
- 8 Asbestos
- 9 Asbestos
- 10 Asbestos
- 11 Asbestos
- 12 Asbestos
- 13 Asbestos
- 14 Biological Safety
- 15 Biological Safety
- 16 Biological Safety
- 17 Biological Safety
- 18 Bloodborne Pathogens
- 19 Bloodborne Pathogens
- 20 Clean Air Act
- 21 Clean Air Act
- 22 Clean Air Act
- 23 Clean Air Act
- 24 Clean Air Act

**Retention:** 10 years  
**Disposition:** Destroy  
**Other copies:**  
**Retention:**  
**Disposition:**  
**Special note:**

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**Title:** **Radiation**  
**Description:** Shipping papers outside of the University - 10 CFR 71.91  
**Office of Record:** REHS  
**Retention:** 5 years  
**Disposition:** Destroy  
**Other copies:**  
**Retention:**  
**Disposition:**  
**Special note:**

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**Title:** **Radiation**  
**Description:** Package Certifications for RAM Shipments - 10 CFR 71.91  
**Office of Record:** REHS  
**Retention:** 5 years after last time package utilized  
**Disposition:** Destroy  
**Other copies:**  
**Retention:**  
**Disposition:**  
**Special note:**

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**Title:** **Radiation**  
**Description:** Internal Dose Surveys - Records of Surveys, 10 CFR Part 20.2103  
**Office of Record:** REHS  
**Retention:** Life of the license  
**Disposition:** Destroy  
**Other copies:**  
**Retention:**  
**Disposition:**  
**Special note:**

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**Title:** **Radiation**  
**Description:** DOT Training Records - 49 CFR 172.704(d)  
**Office of Record:** REHS  
**Retention:** 6 years

**Title:** **Radiation**  
**Description:** Radiation Safety Training Records - 10 CFR 20.2102(b)  
**Office of Record:** REHS  
**Retention:** 10 years  
**Disposition:** Destroy  
**Other copies:**  
**Retention:**  
**Disposition:**  
**Special note:**

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**Title:** **Radioactive Waste**  
**Description:** Mixed Waste Hazardous Waste Manifests - 49 CFR 172.205 (e)(5) {3 years}. Radioactive Waste Manifests for Low-Level Radioactive Waste Intended for Land Disposal / 10 CFR 20 App. G (III)(D)(2)  
**Office of Record:** REHS  
**Retention:** Permanent  
**Disposition:** Permanent  
**Other copies:**  
**Retention:**  
**Disposition:**  
**Special note:**

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**Title:** **Radioactive Waste**  
**Description:** Radioactive waste contamination surveys associated with waste processing (i.e. Post Bulking Wipes, Bi-Monthly wipes, Miscellaneous Wipes / NJ 7:28-8.2(b)  
**Office of Record:** REHS  
**Retention:** 10 years  
**Disposition:** Destroy  
**Other copies:**  
**Retention:**  
**Disposition:**  
**Special note:**

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**Title:** **Radioactive Waste**  
**Description:** Radioactive Waste Inspections of ESB / Part B permit, Section II (5) also 40 CFR 265.15(d). This references inspections for a hazardous waste facility, not necessarily a radioactive waste storage facility  
**Office of Record:** REHS  
**Retention:** 5 years  
**Disposition:** Destroy  
**Other copies:**  
**Retention:**

**Disposition:**  
**Special note:**

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**Title:** **Radioactive Waste**  
**Description:** Radioactive Waste Manifests for Waste Shipped from a Rutgers / UMDNJ to the ESB / 10 CFR 71.91(a) This citation specifically references the shipment of packaged license material, not waste  
**Office of Record:** REHS  
**Retention:** Life of license  
**Disposition:** Destroy  
**Other copies:**  
**Retention:**  
**Disposition:**  
**Special note:**

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**Title:** **Radioactive Waste**  
**Description:** Training Documents - Transportation / 10CFR 71.5(a)(1)(vi) references Hazardous Material Employee training 49 CFR part 172: subpart H (which is 700), record keeping found in 49 CFR 172.704 (d) Training Documents - Hazardous Material / 40 CFR 265.16(e) - F  
**Office of Record:** REHS  
**Retention:** Duration of employment + 3 years  
**Disposition:** Destroy  
**Other copies:**  
**Retention:**  
**Disposition:**  
**Special note:**

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**Title:** **Radioactive Waste**  
**Description:** Drain Disposal Records / Defined in 10 CFR 20.2003, Records retention in 10 CFR 20.2108(b)  
**Office of Record:** REHS  
**Retention:** Permanent  
**Disposition:** Permanent  
**Other copies:**  
**Retention:**  
**Disposition:**  
**Special note:**

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**Title:** **Radioactive Waste**  
**Description:** Records of waste disposal / 10 CFR 20.2108(b)  
**Office of Record:** REHS

**Retention:** Permanent  
**Disposition:** Permanent  
**Other copies:**  
**Retention:**  
**Disposition:**  
**Special note:**

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**Title:** **Radioactive Waste**  
**Description:** HPA printout of container activity, Correspondence w./Radioactive Waste Vendor, Wipe results of container / NA - They are considered internal documents and are not regulated to be kept. Will be kept with radioactive waste manifests shipped offsite  
**Office of Record:** REHS  
**Retention:** Permanent  
**Disposition:** Permanent  
**Other copies:**  
**Retention:**  
**Disposition:**  
**Special note:**

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**Title:** **Radioactive Waste**  
**Description:** Vehicle Inspections 49 CFR 396.21  
**Office of Record:** REHS  
**Retention:** 2 years  
**Disposition:** Destroy  
**Other copies:**  
**Retention:**  
**Disposition:**  
**Special note:**

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**Title:** **Radioactive Waste**  
**Description:** Yellow Cards, Wipe Results for Containers / They are considered internal documents and are not regulated to be kept  
**Office of Record:** REHS  
**Retention:** 10 years  
**Disposition:** Destroy  
**Other copies:**  
**Retention:**  
**Disposition:**  
**Special note:**

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**Title:** **Radioactive Waste**

**Description:** Radioactive / Mixed Waste profiles for disposal at offsite FMS / NA (not considered part of disposal records) 40 CFR 262.40 (c) states that you should keep waste analysis for 3 years. Will be included w/ disposal records.

**Office of Record:** REHS

**Retention:** Permanent

**Disposition:** Permanent

**Other copies:**

**Retention:**

**Disposition:**

**Special note:**

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**Title:** **RCRA**

**Description:** RCRA Training documentation for Environmental Services Staff / 40CFR265.16(e) Former employees

**Office of Record:** REHS

**Retention:** 5 years after employment

**Disposition:** Destroy

**Other copies:**

**Retention:**

**Disposition:**

**Special note:**

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**Title:** **RCRA**

**Description:** Hazardous waste manifests from various sites (SQG, LQG &TSD) / 40CFR262.40(a), 40CFR263.22(a), 40CFR265.71(a)(5)

**Office of Record:** REHS

**Retention:** Permanent

**Disposition:** Permanent

**Other copies:**

**Retention:**

**Disposition:**

**Special note:**

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**Title:** **RCRA**

**Description:** ESB Part-B Permit and Hazardous Material Transporter Registration

**Office of Record:** REHS

**Retention:** Permanent

**Disposition:** Permanent

**Other copies:**

**Retention:**

**Disposition:**

**Special note:**



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**Title:** RCRA  
**Description:** Hazardous waste storage area inspections ESB, Cook 90 Day & Camden 90 Day / 40CFR265.15(d)  
**Office of Record:** REHS  
**Retention:** 50 years  
**Disposition:** Destroy  
**Other copies:**  
**Retention:**  
**Disposition:**  
**Special note:**

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**Title:** RCRA  
**Description:** Bill of ladings from various sites (CESQG) 40CFR265.71(a)(5)  
**Office of Record:** REHS  
**Retention:** Permanent  
**Disposition:** Permanent  
**Other copies:**  
**Retention:**  
**Disposition:**  
**Special note:**

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**Title:** RCRA  
**Description:** Documentation of waste treatment associated with the Environmental Services Building / 40CFR265.73(b)  
**Office of Record:** REHS  
**Retention:** Permanent  
**Disposition:** Permanent  
**Other copies:**  
**Retention:**  
**Disposition:**  
**Special note:**

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**Title:** RCRA  
**Description:** Biennial hazardous waste generation reports / 40 CFR 262.40(b)  
**Office of Record:** REHS  
**Retention:** 50 years  
**Disposition:** Destroy  
**Other copies:**  
**Retention:**  
**Disposition:**

**Special note:**


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**Title:** RCRA  
**Description:** Maintenance records for the ESB, as required by the facility Part-B permit / 40CFR265.73(b)  
**Office of Record:** REHS  
**Retention:** 50 years  
**Disposition:** Destroy  
**Other copies:**  
**Retention:**  
**Disposition:**  
**Special note:**

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**Title:** RCRA  
**Description:** Correspondence with the USEPA associated with hazardous waste matters  
**Office of Record:** REHS  
**Retention:** Permanent  
**Disposition:** Permanent  
**Other copies:**  
**Retention:**  
**Disposition:**  
**Special note:**

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**Title:** RCRA  
**Description:** Correspondence with the NJDEP associated with hazardous waste matters  
**Office of Record:** REHS  
**Retention:** Permanent  
**Disposition:** Permanent  
**Other copies:**  
**Retention:**  
**Disposition:**  
**Special note:**

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**Title:** RCRA  
**Description:** Hazardous waste profiles associated with disposal 40CFR262.40©  
**Office of Record:** REHS  
**Retention:** Permanent  
**Disposition:** Permanent  
**Other copies:**

**Retention:**  
**Disposition:**  
**Special note:**

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**Title:** **RCRA**  
**Description:** Documentation from regulatory inspections associated with hazardous waste generation, storage and treatment  
**Office of Record:** REHS  
**Retention:** Permanent  
**Disposition:** Permanent  
**Other copies:**  
**Retention:**  
**Disposition:**  
**Special note:**

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**Title:** **RCRA**  
**Description:** RCRA training documentation for Environmental Services Staff / 40CFR265.16(e) Current personnel  
**Office of Record:** REHS  
**Retention:** Permanent  
**Disposition:** Permanent  
**Other copies:**  
**Retention:**  
**Disposition:**  
**Special note:**

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**Title:** **RCRA**  
**Description:** Hazardous waste inventories for the Environmental Services Building / 40CFR265.73(b)  
**Office of Record:** REHS  
**Retention:** Permanent  
**Disposition:** Permanent  
**Other copies:**  
**Retention:**  
**Disposition:**  
**Special note:**

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**Title:** **RCRA**  
**Description:** Hazardous waste analysis associated with hazardous waste determinations 40CFR262.40(c)  
**Office of Record:** REHS  
**Retention:** 10 years from shipment

**Disposition:** Destroy

**Other copies:**

**Retention:**

**Disposition:**

**Special note:**

**Title:** **Regulated Medical Waste (RMW)**

**Description:** Manifests N.J.A.C. 7:26-3A.21 (a) 1

**Office of Record:** Individual generators on campus

**Retention:** 3 years from date waste was accepted by initial transporter

**Disposition:** Destroy

**Other copies:**

**Retention:**

**Disposition:**

**Special note:**

**Title:** **Regulated Medical Waste (RMW)**

**Description:** Exception Reports N.J.A.C. 7:26-3A.21 (a) 2

**Office of Record:** Individual generators on campus

**Retention:** 3 years from date report was filed

**Disposition:** Destroy

**Other copies:**

**Retention:**

**Disposition:**

**Special note:**

**Title:** **Regulated Medical Waste (RMW)**

**Description:** Annual Reports N.J.A.C. 7:26-3A.21 (f)

**Office of Record:** REHS

**Retention:** 3 years from date report was filed or created

**Disposition:** Destroy

**Other copies:**

**Retention:**

**Disposition:**

**Special note:**

**Title:** **Regulated Medical Waste (RMW)**

**Description:** Inspection Reports N.J.A.C. 7:26-3A.21 (f)

**Office of Record:** REHS

**Retention:** 3 years from date report was filed or created

**Disposition:** Destroy

THE STATE UNIVERSITY OF NEW JERSEY

**RUTGERS**

Office of the Associate Vice President for Business Services  
Rutgers, The State University of New Jersey  
83 Somerset Street  
New Brunswick • New Jersey 08901-1281

To:

Mr. Harry R. Steinmetz (3HS62)  
U.S. Environmental Protection  
Agency, Region 3  
1650 Arch Street  
Philadelphia, PA 19103-2029

